

**AFFIDAVIT IN SUPPORT  
OF GOVERNMENT'S RESPONSE TO MOTION TO SUPPRESS STATEMENT MADE BY  
WILLIAM N. MARTIN ON JANUARY 23, 2004.**

I, Eric T. Brelsford, being duly sworn, depose and say that:

1. I have been employed as a Special Agent of the FBI since May 2003, and am currently assigned to the Milwaukee Field Office. In that capacity, I am charged with conducting investigations of violations of federal law including child pornography, coercion and enticement, and sexual abuse of a minor.
2. This affidavit is being submitted in support of Government's response to Defendant William N. Martin's motion to suppress a statement made by William N. Martin on January 23, 2004 to FBI Special Agents James B. Doyle and Eric T. Brelsford.
3. The factual information supplied in this affidavit is based upon my recollection of events and information provided to me by other members of the FBI, other state and local law enforcement officers, and the members of United States Attorney's Office for the Eastern District of Wisconsin.
4. On January 23, 2004, an arrest warrant was issued for William N. Martin, DOB 06/28/71, for violations of Title 18, United States Code, Section 2251(a).
5. On January 23, 2004 at approximately 8:36 a.m., Martin was taken into custody in Beaver Dam, Wisconsin by uniformed members of the Beaver Dam Police Department. Martin was then transported to the Beaver Dam Police Department.
6. At approximately 9:00 a.m., Martin was brought to an interview room at the Beaver Dam Police Department.
7. At approximately 9:03 a.m., FBI Special Agent James B. Doyle and I entered the room. Special Agent Doyle inquired if Martin required anything such as a cup of coffee, which Martin declined.. Martin did smoke cigarettes during the interview. Special Agent Doyle and I then gathered general biographical information from Martin.
8. Martin was presented with an FBI Advise of Rights form at 9:36 a.m. Martin read the form and initialed each right. Martin indicated that he understood his rights and signed the waiver

**Attachment B**

indicating "I have read this statement of my rights and I understand what my rights are. At this time, I am willing to answer questions without a lawyer present." At this time Special Agent Doyle and I began to question Martin regarding activities related to the sexual exploitation of children.

9. During the course of the interview, Martin was allowed to use the restroom whenever he requested, was allowed to smoke in the interview room, and was offered something to drink. At approximately 2:45 p.m., a meal from McDonald's was brought in for Martin. The interview was ended at 3:10 p.m.
10. Snow began to fall heavily in Beaver Dam and across Eastern Wisconsin during the course of the day on January 23, 2004. By 3:00 p.m., approximately 4 - 6 inches of snow had fallen in the Beaver Dam area and was continuing to fall. The distance from Beaver Dam to Green Bay is approximately 90 miles.
11. At the conclusion of the interview, FBI Special Agent Gerald Mullen contacted Jan Klika of the United States Attorney's Office for the Eastern District of Wisconsin, to determine when Martin would be brought before the Magistrate for his initial appearance. Klika contacted the office of Magistrate Judge James Sickel and was advised that Martin would be seen on Monday morning for his initial appearance.
12. Klika was subsequently contacted by either the office of Magistrate Judge Sickel or the District Court Clerk's Office and told that Martin was to be brought to court Saturday morning for his initial appearance. Klika then contacted the FBI and relayed this information.
13. Martin was transported to the Dodge County Justice Facility in Juneau, Wisconsin and checked into the jail at 3:48 p.m..
14. On January 24, 2004, Special Agent Mullen and United States Deputy Marshal Ducoker transported Martin from the Dodge County Justice Facility to Green Bay for his initial appearance. Martin was checked out of the jail at 8:08 a.m.

928-271-  
4800

66 miles between Beaver Dam &  
Milwaukee

Subscribed and sworn before me

\_\_\_\_\_  
Affiant,  
FBI SA Eric T. Brelsford

This \_\_\_\_ of September, 2004

\_\_\_\_\_  
Notary Public, State of Wisconsin.  
My Commission is permanent.